

## **REMARKS**

1. Present Status of Patent Application

This is a full and timely response to the Non-Final Office Action of June 4, 2010. Claims 1, 9, and 17. Claims 1-4, 6, 9-12, 14, 17-20, and 22 remain pending in the application. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

2. Telephone Interview

The Examiner is encouraged to contact Assignee's attorney, after reviewing the present response, to resolve or discuss any questions or outstanding issues in an effort to expedite examination of the present application.

3. Rejection of Claims under 35 U.S.C. §103

Claims 1-4, 6, 9-12, 14, 17-20, and 22 stand rejected under 35 U.S.C. §103(a) as purportedly being unpatentable over *Kite* (U.S. Patent Publication No. 2005/0149372 A1) in view of *VanDusen* (U.S. Patent Publication No. 2003/0208397 A1). It is well-established at law that, for a proper rejection of a claim under 35 U.S.C. §103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest, either implicitly or explicitly, all elements/features/steps of the claim at issue. See, e.g., *In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

a. Discussion of Cited Art

In the "Description of the Related Art" section of the present application, the following procedure is described. A network operations center (NOC) includes engineers who generate engineering work-orders (EWOs) ["phase 1"]. The EWOs are sent to a record maintenance center (RMC) group, typically consisting of draftsmen and a construction group. The RMC is typically where the engineering work order is pre-posted which involves altering the existing drawing records ["phase 2"]. Outside plant construction management then typically builds the changes into the network and closes the job ["phase 3"]. The designing engineer approves the work ["phase 4"] and RMC performs final posting

of the drawings ["phase 5"]. Final posting involves checking the constructions against the work order and resolving any differences. Any differences are added into the final post drawings. "These changes can involve 15,000 jobs per month, in one example, among others. This volume can result in significant backlogs of up to many years for some RMCs." Pages 2-3.

The claimed subject matter is directed to managing aspects of the workflow within the record maintenance center or phases 2 (pre-posting) and 5 (final posting). In contrast, *Kite* is directed to phase 1 or network planning: "The FMT may include a central repository for documenting Location Relief Strategies (LRS) plans created by FACILITY PLANNERSs and Long Term Planners. The FMT may include a planned data layer that allows definition of FACILITY PLANNERS, and tool for creating and maintaining future LSRs including fiber network, fiber strands, and associated DLE information." Paragraph 0319. Accordingly, *Kite* is not directed to solving or addressing problems encountered in the maintenance of drawing records by a record maintenance center.

**b. Claim 1**

Independent claim 1 recites:

An engineering drawing management and assignment system, comprising:

- a computer processor;

- a database storing a fiber splice drawing record associated with a wirecenter, the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter, the engineering drawing management and assignment system tracking workflow of engineering drawing jobs identified by a plurality of fiber splice drawing records;

- interface logic presenting graphical user interfaces with interface options to select to assign the fiber splice drawing record; to select to close the fiber splice drawing record; and to select to request reports on statuses of engineering drawing jobs;

- assignment logic coupled to the database assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman and recording the assignment in response to a selection to assign the fiber splice drawing record via a first interface option;

completion logic coupled to the database receiving a selection to close the fiber splice drawing record from the draftsman via a second interface option, and receiving a credit amount associated with the engineering drawing job from a manager, the credit amount being assigned to the draftsman that performed the engineering drawing job; and

***reporting logic coupled to the database producing a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; producing a second report identifying each completed fiber splice drawing record assigned to the draftsman; producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option.***

(Emphasis added).

Independent claim 1 is allowable for at least the reason that *Kite* in view of *VanDusen* does not disclose, teach, or suggest at least “reporting logic coupled to the database producing a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; producing a second report identifying each completed fiber splice drawing record assigned to the draftsman; producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option,” as emphasized above.

For example, *Kite* discloses a fiber management tool (FMT). “The FMT can be a computer-based application that may provide an integrated view and monitoring of utilization of an existing fiber optic network and associated digital loop electronics, and may make this information more readily accessible to Network FACILITY PLANNERSs, Designers, Long Term Planners, and Construction Repair technicians, which may shorten information research time. . . . The FMT application may display a graphical as well as a tabular view of data. The graphical layer may graphically display fiber network elements (ex. Fiber routes, remote terminals, central offices, equipment), supporting

structures (ex. Conduit, manholes, poles) at defined geographical levels (ex. Wire center, state, district), and/or associated landbase features (ex. Streets, parcels, lakes, rivers)." Paragraph 0317.

*Kite* is concerned with network planning and not the flow of work involved in maintaining drawing records: "The FMT may include a central repository for documenting Location Relief Strategies (LRS) plans created by FACILITY PLANNERSs and Long Term Planners. The FMT may include a planned data layer that allows definition of FACILITY PLANNERS, and tool for creating and maintaining future LSRs including fiber network, fiber strands, and associated DLE information." Paragraph 0319.

Accordingly, *Kite* does not disclose reporting operations or functions similar to "reporting logic coupled to the database to identify each fiber splice drawing record assigned to the draftsman; to identify each completed fiber splice drawing record assigned to the draftsman; to identify each fiber splice drawing record assigned to a facility of draftsman; and to identify each completed fiber splice drawing record within a defined geographical region," as recited in claim 1. Further, *Kite* fails to disclose a mechanism or user interface by which a fiber splice drawing record is assigned to a draftsman and/or able to closed or completed.

Rather, *Kite* describes the creation and modification of location relief strategies by providing drawing tools and symbols to be used in denoting necessary equipment and facility items with the location relief strategy. See para. 0498. While *Kite* discloses that a user may find and open desired location relief strategies using search queries, *Kite* does not provide a first report identifying each fiber splice drawing record assigned to the draftsman; a second report identifying each completed fiber splice drawing record assigned to the draftsman; a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; or a fourth report identifying each completed fiber splice drawing record within a defined geographical region.

In particular, the Office Action provides the following citations in *Kite* that are alleged to disclose claimed subject matter:

"the fiber splice drawing record identifying an engineering drawing job (Page 7, [0318], lines 9 - 1; features/attributes to the FMT SDO Database; both automatically from mechanized wire centers, and manually for non-mechanized wire centers ..; Kite)"

"for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter, the engineering drawing management (Page 7, [0318], lines 1 - 14, The FMT may include functionality of, or integrate with, existing Mechanized Facility Management database . . ., Kite)"

"assignment system tracking engineering drawing jobs identified by a plurality of fiber splice drawing records (Page 28, [0449], lines 1 - 6, FMT can provide user the ability to view SCID assignments, select a new SCID assignment, and to unassign . . ., Page 46, [0562], Table: "EWO # (Engineering Work Order) Engineering work order that placed or modified that piece of equipment", Kite)".

In response, the claim recites "the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter, the engineering drawing management and assignment system tracking workflow of engineering drawing jobs identified by a plurality of fiber splice drawing records." Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings. In contrast, the cited portions of *Kite* describe a tool used to add fiber locations and features/attributes to a FMT SDO database. See paragraph 0318. *Kite* does not disclose the management of records of assigned fiber splice jobs. *Kite* also discloses the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that "placed or modified that piece of equipment." See paragraphs 0449 and 0562. Neither of which discloses the management of records of assigned fiber splice jobs. Accordingly, the cited portions of *Kite* fail to disclose at least "the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter, the engineering drawing management and assignment system tracking workflow of engineering drawing jobs identified by a plurality of fiber splice drawing records."

In addition, the Office Action provides the following citations in *Kite* that are alleged to disclose claimed subject matter:

"assignment logic coupled to the database (Page 41, [0549], lines 1 - 8, Loop Facilities Assignment and Control System, Kite), assigning a fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman ([0362], [0436], [0498], [0499], [0500], [0665], and Page 7, [0337], lines 4 - 11; "... Construction is responsible for repair and splicing work. The Splicing technicians in Construction deal with major problems...", Kite)"

"recording the assignment (Page 41, [0549], lines 9 -12, Page 41 and 46, [0549] and [0562], lines 2 - 12 and Table: "EWO # (Engineering Work Order) Engineering work order that placed or modified that piece of equipment"; LFACS is an inventory and assignment system for the outside plant . . . ; respectively, Page 37, [0509], Table: Embodiment: Provide user with the ability to manage LRS notes through a graphical feature by user ... System Behavior: Users with the access to FMT can enter LRS notes through a graphical feature, Kite)"

"completion logic coupled to the database, receiving a request to close the fiber splice drawing record (Page 55, [0743], lines 5 - 9, Kite) from a draftsman (Page 42, [0556], Table: Service Required: Date by when FACILITY PLANNERS believes service is required for this plan, Kite)"

In response, the claim recites "assignment logic coupled to the database assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman and recording the assignment in response to a selection to assign the fiber splice drawing record via a first interface option." Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings and the assigning of this record to draftsman and receiving a request from the draftsman to close the record. In contrast, the cited portions of *Kite* describe a Loop Facilities Assignment And Control System which is an inventory and assignment system for assigning equipment to a facility and therefore maintaining the inventory of the equipment at the facility. See paragraph 0549. Therefore, *Kite* fails to teach or suggest "assignment logic coupled to the database assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman and recording the assignment in response to a selection to assign the fiber splice drawing record via a first interface option."

Paragraph 0743 of *Kite* is alleged to disclose “completion logic coupled to the database, receiving a request to close the fiber splice drawing record from the draftsman.” However, paragraph 0743 specifically states:

OPEDS can be designed to support high availability. OPEDS shall have the capability to be initialized/terminated by manual input or automated script. Each application service can be documented in the context of appropriate libraries. OPEDS shall retain a log of all activation events. OPEDS can provide the capability for daily removal of all completed activation's from the on-line database and for sending them to an archive (i.e., a non-OLTP database, data warehouse database). OPEDS can be remotely administered. A single point of administration, per domain, shall be provided to manage CUIDs and passwords.

OPEDS is an Outside Plant Engineering Design System or a system Outside Plant facilities and landbase, according to *Kite*. Accordingly, *Kite* fails to disclose the management of records of assigned fiber splice jobs. Accordingly, the cited portions of *Kite* fail to disclose at least “completion logic coupled to the database receiving a selection to close the fiber splice drawing record from the draftsman via a second interface option, and receiving a credit amount associated with the engineering drawing job from a manager, the credit amount being assigned to the draftsman that performed the engineering drawing job.”

With regard to *VanDusen*, the reference discloses a method of doing business by creating an equity pool and compensating an associate with a portion of the equity pool. The Office Action contends that “VanDusen discloses tracking workflows jobs (Page 26, [1034], lines 13 - 17, VanDusen), which further includes receive a credit amount associated with jobs (Page 14, [0557], line 1, VanDusen).” The Office Action provides the following citations in *Kite* and *VanDusen* that are alleged to disclose claimed subject matter:

“reporting logic couple to the database producing a first report identifying each fiber splice drawing record assigned to the draftsman ([0429], and [0647], *Kite*; and Page8, [0235], lines 1 - 8, VanDusen)”

“producing a second report identifying each completed fiber splice drawing record assigned to the draftsman (Page 30, [0479], lines 56 - 62, and [0519], *Kite*; and Page 31, [1162], lines1 - 6, VanDusen)”

"producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen (Page 28, [0449], lines 1 - 3, and [0519], *Kite*; and Page 8, [0257], lines 4 - 7, VanDusen)"

"producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region ([0516], and [0517], *Kite*)".

In response, the claim recites "reporting logic coupled to the database producing a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; producing a second report identifying each completed fiber splice drawing record assigned to the draftsman; producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option." Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings and producing a first report identifying each record assigned to the draftsman; a second report identifying each completed record assigned to the draftsman; a third report identifying each record assigned to a facility of the draftsman; and a fourth report identifying each completed record with a defined geographic region. In contrast, the cited portions of *Kite* describe that FMS maintains which fiber strands are in use in various equipment, see paragraph 0429, and maintains statuses of fibers, see paragraph 0647. "User selects a tool in order to perform a certain function to a fiber, fiber strand, etc. such as assign reservation status, restoration priority, fiber strand diversity. 4. The system assigns the value appropriately to the fiber according to what the user indicated. 5. The user also may print out or view a report about the fiber, etc. 6. User logs out when finished." Paragraph 0655.

FMS may also be used to view states of location relief strategies. See paragraph 0479. *Kite* also discloses the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that "placed or modified that piece of equipment." See paragraphs 0449 and 0562. *Kite* further discloses reports of actual



and forecasted network usage. See paragraph 0519. Paragraph 0516, referenced in the Office Action, describes summary reports on a company's fiber optic assets and paragraph 0517, cited in the Office Action, describes creating queries using a tool "capable of querying data related to equipment Xbox, CSA, Fiber, and LRS and performing joins."

None of which discloses the management of records of assigned fiber splice jobs. For example, paragraph 0235, cited in the Office Action, of *VanDusen* discloses getting a "report on the number of users who viewed that page within a set period of time." Paragraph 1162 of *VanDusen*, cited in the Office Action, discloses "a database of completed tasks containing the reported evaluations of skills, abilities, and performance of the individual performers, so that these data may be made available to prospective employers and other interested parties." Paragraph 257 of *VanDusen*, cited in the Office Action, discloses "[c]omprehensive Web-based tools for business users to manage the scheduling & delivery of site assets."

Accordingly, the cited portions of *Kite* and *VanDusen* fail to disclose at least "reporting logic coupled to the database producing a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; producing a second report identifying each completed fiber splice drawing record assigned to the draftsman; producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option." Accordingly, *VanDusen* fails to cure the deficiencies of the *Kite* reference in suggesting or teaching all of the claimed features in claim 1. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kite* with *VanDusen* has not been made and the rejection of claim 1 should be withdrawn.

In the Office Action regarding Assignee's earlier arguments, it is stated that the "Examiner respectfully disagrees. Kite/VanDusen does disclose: outputting a first report identifying each engineering drawing job assigned to the draftsman ([0429], and [0647],

Kite; and Page 8, [0235], lines 1 - 8, VanDusen); outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman (Page 30, [0479], lines 56 - 62, and [0519], Kite; and Page 31, [1162], lines 1 - 6, VanDusen); outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen (Page 28, [0449], lines 1 - 3, and [0519], Kite; and Page 8, [0257], lines 4 - 7, VanDusen); and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region ([0516], and [0517], Kite)." Pages 10-11.

Assignee respectfully disagrees and submits that, based on a review of the Office Action citations and respective disclosures, *Kite/VanDusen* discloses at most a report on which fiber strands are in use in various equipment; a report on a status of a location relief strategy, a report on the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that "placed or modified that piece of equipment"; a report on network usage forecasts; and queries on equipment. None of which discloses the management of records of assigned fiber splice jobs. For at least these reasons, the rejection should be withdrawn.

**c. Claims 2-4 and 6**

Dependent claims 2-4 and 6 are allowable as a matter of law for at least the reason that dependent claims 2-4 and 6 contain all the elements and features of independent claim 1. For at least this reason, the rejections of claims 2-4 and 6 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability, these dependent claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record.

**d. Claim 9**

Independent claim 9 recites:

A method for assigning and managing a plurality of engineering drawing jobs, comprising:  
storing a fiber splice drawing record associated with a wirecenter in a database, the fiber splice drawing record identifying an engineering

drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter;

presenting graphical user interfaces with interface options to select to assign the fiber splice drawing record; to select to close the fiber splice drawing record; and to select to request reports on statuses of engineering drawing jobs;

assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman as part of workflow tracking process for engineering drawing jobs in response to a selection to assign the fiber splice drawing record via one of the graphical user interfaces comprising a first graphical user interface;

recording the assignment;

receiving a request from a user via one of the graphical user interfaces comprising a second graphical user interface to mark the fiber splice drawing record as closed;

assigning credit for the engineering drawing job based upon input from a manager via one of the graphical user interfaces comprising a third graphical user interface, the credit being assigned to the draftsman that performed the engineering drawing job;

***outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record;***

***outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman;***

***outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and***

***outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region,***

***wherein a report is produced in response to a selection of the report via an interface option.***

(Emphasis added).

Independent claim 9 is allowable for at least the reason that *Kite* in view of *VanDusen* does not disclose, teach, or suggest at least "outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record

within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option,” as emphasized above.

For example, *Kite* discloses a fiber management tool (FMT). “The FMT can be a computer-based application that may provide an integrated view and monitoring of utilization of an existing fiber optic network and associated digital loop electronics, and may make this information more readily accessible to Network FACILITY PLANNERSs, Designers, Long Term Planners, and Construction Repair technicians, which may shorten information research time. . . . The FMT application may display a graphical as well as a tabular view of data. The graphical layer may graphically display fiber network elements (ex. Fiber routes, remote terminals, central offices, equipment), supporting structures (ex. Conduit, manholes, poles) at defined geographical levels (ex. Wire center, state, district), and/or associated landbase features (ex. Streets, parcels, lakes, rivers).” Paragraph 0317.

*Kite* is concerned with network planning and not the flow of work involved in maintaining drawing records: “The FMT may include a central repository for documenting Location Relief Strategies (LRS) plans created by FACILITY PLANNERSs and Long Term Planners. The FMT may include a planned data layer that allows definition of FACILITY PLANNERS, and tool for creating and maintaining future LSRs including fiber network, fiber strands, and associated DLE information.” Paragraph 0319.

Accordingly, *Kite* does not disclose reporting operations or functions similar to “outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option,” as recited in claim 9. Further, *Kite* fails to disclose a mechanism or user interface by which a fiber splice drawing record is assigned to a draftsman and/or able to closed or completed.

Rather, *Kite* describes the creation and modification of location relief strategies by providing drawing tools and symbols to be used in denoting necessary equipment and facility items with the location relief strategy. See para. 0498. While *Kite* discloses that a user may find and open desired location relief strategies using search queries, *Kite* does not provide a first report identifying each fiber splice drawing record assigned to the draftsman; a second report identifying each completed fiber splice drawing record assigned to the draftsman; a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; or a fourth report identifying each completed fiber splice drawing record within a defined geographical region.

In particular, the Office Action provides the following citations in *Kite* that are alleged to disclose claimed subject matter:

"the fiber splice drawing record identifying an engineering drawing job (Page 7, [0318], lines 9 - 1; features/attributes to the FMT SDO Database; both automatically from mechanized wire centers, and manually for non-mechanized wire centers .;. Kite)"

"for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter, the engineering drawing management (Page 7, [0318], lines 1 - 14, The FMT may include functionality of, or integrate with, existing Mechanized Facility Management database . . ., Kite)"

"assignment system tracking engineering drawing jobs identified by a plurality of fiber splice drawing records (Page 28, [0449], lines 1 - 6, FMT can provide user the ability to view SCID assignments, select a new SCID assignment, and to unassign . . ., Page 46, [0562], Table: "EWO # (Engineering Work Order) Engineering work order that placed or modified that piece of equipment", Kite)".

In response, the claim recites "the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter." Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings. In contrast, the cited portions of *Kite* describe a tool used to add fiber locations and features/attributes to a FMT SDO database. See paragraph 0318. *Kite* does not

disclose the management of records of assigned fiber splice jobs. *Kite* also discloses the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that “placed or modified that piece of equipment.” See paragraphs 0449 and 0562. Neither of which discloses the management of records of assigned fiber splice jobs. Accordingly, the cited portions of *Kite* fail to disclose at least “the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter.”

In addition, the Office Action provides the following citations in *Kite* that are alleged to disclose claimed subject matter:

“assignment logic coupled to the database (Page 41, [0549], lines 1 - 8, Loop Facilities Assignment and Control System, *Kite*), assigning a fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman ([0362], [0436], [0498], [0499], [0500], [0665], and Page 7, [0337], lines 4 - 11; “. . . Construction is responsible for repair and splicing work. The Splicing technicians in Construction deal with major problems...”, *Kite*)”

“recording the assignment (Page 41, [0549], lines 9 -12, Page 41 and 46, [0549] and [0562], lines 2 - 12 and Table: “EWO # (Engineering Work Order) Engineering work order that placed or modified that piece of equipment”; LFACS is an inventory and assignment system for the outside plant . . .; respectively, Page 37, [0509], Table: Embodiment: Provide user with the ability to manage LRS notes through a graphical feature by user ... System Behavior: Users with the access to FMT can enter LRS notes through a graphical feature, *Kite*)”

“completion logic coupled to the database, receiving a request to close the fiber splice drawing record (Page 55, [0743], lines 5 - 9, *Kite*) from a draftsman (Page 42, [0556], Table: Service Required: Date by when FACILITY PLANNERS believes service is required for this plan, *Kite*)”

In response, the claim recites “assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman as part of workflow tracking process for engineering drawing jobs in response to a selection to assign the fiber splice drawing record via one of the graphical user interfaces comprising a first graphical user interface.” Therefore, the claim describes a record of a

drawing job for adding fiber splice representations in engineering drawings and the assigning of this record to draftsman and receiving a request from the draftsman to close the record. In contrast, the cited portions of *Kite* describe a Loop Facilities Assignment And Control System which is an inventory and assignment system for assigning equipment to a facility and therefore maintaining the inventory of the equipment at the facility. See paragraph 0549. Therefore, *Kite* fails to teach or suggest "assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman as part of workflow tracking process for engineering drawing jobs in response to a selection to assign the fiber splice drawing record via one of the graphical user interfaces comprising a first graphical user interface."

Paragraph 0743 of *Kite* is alleged to disclose "receiving a request from a user via one of the graphical user interfaces comprising a second graphical user interface to mark the fiber splice drawing record as closed." However, paragraph 0743 specifically states:

OPEDS can be designed to support high availability. OPEDS shall have the capability to be initialized/terminated by manual input or automated script. Each application service can be documented in the context of appropriate libraries. OPEDS shall retain a log of all activation events. OPEDS can provide the capability for daily removal of all completed activation's from the on-line database and for sending them to an archive (i.e., a non-OLTP database, data warehouse database). OPEDS can be remotely administered. A single point of administration, per domain, shall be provided to manage CUIDs and passwords.

OPEDS is an Outside Plant Engineering Design System or a system Outside Plant facilities and landbase, according to *Kite*. Accordingly, *Kite* fails to disclose the management of records of assigned fiber splice jobs. Accordingly, the cited portions of *Kite* fail to disclose at least "receiving a request from a user via one of the graphical user interfaces comprising a second graphical user interface to mark the fiber splice drawing record as closed."

With regard to *VanDusen*, the reference discloses a method of doing business by creating an equity pool and compensating an associate with a portion of the equity pool. The Office Action contends that "VanDusen discloses tracking workflows jobs (Page 26, [1034], lines 13 - 17, VanDusen), which further includes receive a credit amount

associated with jobs (Page 14, [0557], line 1, VanDusen)." The Office Action provides the following citations in *Kite* and *VanDusen* that are alleged to disclose claimed subject matter:

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"producing a second report identifying each completed fiber splice drawing record assigned to the draftsman (Page 30, [0479], lines 56 - 62, and [0519], *Kite*; and Page 31, [1162], lines1 - 6, *VanDusen*)"

"producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen (Page 28, [0449], lines 1 - 3, and [0519], *Kite*; and Page 8, [0257], lines 4 - 7, *VanDusen*)"

"producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region ([0516], and [0517], *Kite*)".

In response, the claim recites "outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option." Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings and producing a first report identifying each record assigned to the draftsman; a second report identifying each completed record assigned to the draftsman; a third report identifying each record assigned to a facility of the draftsman; and a fourth report identifying each completed record with a defined geographic region. In contrast, the cited portions of *Kite* describe that FMS maintains which fiber strands are in use in various equipment, *see* paragraph 0429, and maintains statuses of fibers, *see* paragraph 0647. "User selects a tool in order to perform a certain function to a fiber, fiber strand, etc. such as assign



reservation status, restoration priority, fiber strand diversity. 4. The system assigns the value appropriately to the fiber according to what the user indicated. 5. The user also may print out or view a report about the fiber, etc. 6. User logs out when finished." Paragraph 0655.

FMS may also be used to view states of location relief strategies. See paragraph 0479. *Kite* also discloses the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that "placed or modified that piece of equipment." See paragraphs 0449 and 0562. *Kite* further discloses reports of actual and forecasted network usage. See paragraph 0519. Paragraph 0516, referenced in the Office Action, describes summary reports on a company's fiber optic assets and paragraph 0517, cited in the Office Action, describes creating queries using a tool "capable of querying data related to equipment Xbox, CSA, Fiber, and LRS and performing joins."

None of which discloses the management of records of assigned fiber splice jobs. For example, paragraph 0235, cited in the Office Action, of *VanDusen* discloses getting a "report on the number of users who viewed that page within a set period of time." Paragraph 1162 of *VanDusen*, cited in the Office Action, discloses "a database of completed tasks containing the reported evaluations of skills, abilities, and performance of the individual performers, so that these data may be made available to prospective employers and other interested parties." Paragraph 257 of *VanDusen*, cited in the Office Action, discloses "[c]omprehensive Web-based tools for business users to manage the scheduling & delivery of site assets."

Accordingly, the cited portions of *Kite* and *VanDusen* fail to disclose at least "outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option." Accordingly, *VanDusen*

fails to cure the deficiencies of the *Kite* reference in suggesting or teaching all of the claimed features in claim 9. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kite* with *VanDusen* has not been made and the rejection of claim 9 should be withdrawn.

In the Office Action regarding Assignee's earlier arguments, it is stated that the "Examiner respectfully disagrees. *Kite/VanDusen* does disclose: outputting a first report identifying each engineering drawing job assigned to the draftsman ([0429], and [0647], *Kite*; and Page 8, [0235], lines 1 - 8, *VanDusen*); outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman (Page 30, [0479], lines 56 - 62, and [0519], *Kite*; and Page 31, [1162], lines 1 - 6, *VanDusen*); outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen (Page 28, [0449], lines 1 - 3, and [0519], *Kite*; and Page 8, [0257], lines 4 - 7, *VanDusen*); and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region ([0516], and [0517], *Kite*)." Pages 10-11.

Assignee respectfully disagrees and submits that, based on a review of the Office Action citations and respective disclosures, *Kite/VanDusen* discloses at most a report on which fiber strands are in use in various equipment; a report on a status of a location relief strategy, a report on the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that "placed or modified that piece of equipment"; a report on network usage forecasts; and queries on equipment. None of which discloses the management of records of assigned fiber splice jobs. For at least these reasons, the rejection should be withdrawn.

**e. Claims 10-12 and 14**

Dependent claims 10-12 and 14 are allowable as a matter of law for at least the reason that dependent claims 10-12 and 14 contain all the elements and features of independent claim 9. For at least this reason, the rejections of claims 10-12 and 14 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability, these dependent claims recite further features and/or combinations of features

(as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record.

f. **Claim 17**

Independent claim 17 recites:

A computer readable medium having a program for assigning and managing a plurality of engineering drawing jobs, the program comprising:

storing a fiber splice drawing record associated with a wirecenter in a database, the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter;

presenting graphical user interfaces with interface options to select to assign the fiber splice drawing record; to select to close the fiber splice drawing record; and to select to request reports on statuses of engineering drawing jobs;

assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman as part of workflow tracking process for engineering drawing jobs in response to a selection to assign the fiber splice drawing record via one of the graphical user interfaces comprising a first graphical user interface;

recording the assignment;

receiving a request from a user via one of the graphical user interfaces comprising a second graphical user interface to mark the fiber splice drawing record as closed;

assigning credit for the engineering drawing job based upon input from a manager via one of the graphical user interfaces comprising a third graphical user interface, the credit being assigned to the draftsman that performed the engineering drawing job;

***outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record;***

***outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman;***

***outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and***

***outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region,***

***wherein a report is produced in response to a selection of the report via an interface option.***

(Emphasis added).

Independent claim 17 is allowable for at least the reason that *Kite* in view of *VanDusen* does not disclose, teach, or suggest at least “outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option,” as emphasized above.

For example, *Kite* discloses a fiber management tool (FMT). “The FMT can be a computer-based application that may provide an integrated view and monitoring of utilization of an existing fiber optic network and associated digital loop electronics, and may make this information more readily accessible to Network FACILITY PLANNERSs, Designers, Long Term Planners, and Construction Repair technicians, which may shorten information research time. . . . The FMT application may display a graphical as well as a tabular view of data. The graphical layer may graphically display fiber network elements (ex. Fiber routes, remote terminals, central offices, equipment), supporting structures (ex. Conduit, manholes, poles) at defined geographical levels (ex. Wire center, state, district), and/or associated landbase features (ex. Streets, parcels, lakes, rivers).” Paragraph 0317.

*Kite* is concerned with network planning and not the flow of work involved in maintaining drawing records: “The FMT may include a central repository for documenting Location Relief Strategies (LRS) plans created by FACILITY PLANNERSs and Long Term Planners. The FMT may include a planned data layer that allows definition of FACILITY PLANNERS, and tool for creating and maintaining future LSRs including fiber network, fiber strands, and associated DLE information.” Paragraph 0319.

Accordingly, *Kite* does not disclose reporting operations or functions similar to “outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a

second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option,” as recited in claim 17. Further, *Kite* fails to disclose a mechanism or user interface by which a fiber splice drawing record is assigned to a draftsman and/or able to closed or completed.

Rather, *Kite* describes the creation and modification of location relief strategies by providing drawing tools and symbols to be used in denoting necessary equipment and facility items with the location relief strategy. See para. 0498. While *Kite* discloses that a user may find and open desired location relief strategies using search queries, *Kite* does not provide a first report identifying each fiber splice drawing record assigned to the draftsman; a second report identifying each completed fiber splice drawing record assigned to the draftsman; a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; or a fourth report identifying each completed fiber splice drawing record within a defined geographical region.

In particular, the Office Action provides the following citations in *Kite* that are alleged to disclose claimed subject matter:

“the fiber splice drawing record identifying an engineering drawing job (Page 7, [0318], lines 9 - 1; features/attributes to the FMT SDO Database; both automatically from mechanized wire centers, and manually for non-mechanized wire centers .; Kite)”

“for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter, the engineering drawing management (Page 7, [0318], lines 1 - 14, The FMT may include functionality of, or integrate with, existing Mechanized Facility Management database . . ., Kite)”

“assignment system tracking engineering drawing jobs identified by a plurality of fiber splice drawing records (Page 28, [0449], lines 1 - 6, FMT can provide user the ability to view SCID assignments, select a new SCID assignment, and to unassign . . ., Page 46, [0562], Table: “EWO # (Engineering Work Order) Engineering work order that placed or modified that piece of equipment”, Kite)”.

In response, the claim recites “the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter.” Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings. In contrast, the cited portions of *Kite* describe a tool used to add fiber locations and features/attributes to a FMT SDO database. See paragraph 0318. *Kite* does not disclose the management of records of assigned fiber splice jobs. *Kite* also discloses the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that “placed or modified that piece of equipment.” See paragraphs 0449 and 0562. Neither of which discloses the management of records of assigned fiber splice jobs. Accordingly, the cited portions of *Kite* fail to disclose “the fiber splice drawing record identifying an engineering drawing job for adding fiber splice representations in engineering drawings for each location where a fiber cable representation crosses the wirecenter boundary representation into another wirecenter.”

In addition, the Office Action provides the following citations in *Kite* that are alleged to disclose claimed subject matter:

“assignment logic coupled to the database (Page 41, [0549], lines 1 - 8, Loop Facilities Assignment and Control System, *Kite*), assigning a fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman ([0362], [0436], [0498], [0499], [0500], [0665], and Page 7, [0337], lines 4 - 11; “. . . Construction is responsible for repair and splicing work. The Splicing technicians in Construction deal with major problems...”, *Kite*)”

“recording the assignment (Page 41, [0549], lines 9 -12, Page 41 and 46, [0549] and [0562], lines 2 - 12 and Table: “EWO # (Engineering Work Order) Engineering work order that placed or modified that piece of equipment”; LFACS is an inventory and assignment system for the outside plant . . . ; respectively, Page 37, [0509], Table: Embodiment: Provide user with the ability to manage LRS notes through a graphical feature by user ... System Behavior: Users with the access to FMT can enter LRS notes through a graphical feature, *Kite*)”

“completion logic coupled to the database, receiving a request to close the fiber splice drawing record (Page 55, [0743], lines 5 - 9, *Kite*) from a draftsman (Page 42, [0556], Table: Service Required: Date by

when FACILITY PLANNERS believes service is required for this plan, Kite)”

In response, the claim recites “assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman as part of workflow tracking process for engineering drawing jobs in response to a selection to assign the fiber splice drawing record via one of the graphical user interfaces comprising a first graphical user interface.” Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings and the assigning of this record to draftsman and receiving a request from the draftsman to close the record. In contrast, the cited portions of *Kite* describe a Loop Facilities Assignment And Control System which is an inventory and assignment system for assigning equipment to a facility and therefore maintaining the inventory of the equipment at the facility. See paragraph 0549. Therefore, *Kite* fails to teach or suggest “assigning the fiber splice drawing record associated with the engineering drawing job for the wirecenter to a draftsman as part of workflow tracking process for engineering drawing jobs in response to a selection to assign the fiber splice drawing record via one of the graphical user interfaces comprising a first graphical user interface.”

Paragraph 0743 of *Kite* is alleged to disclose “receiving a request from a user via one of the graphical user interfaces comprising a second graphical user interface to mark the fiber splice drawing record as closed.” However, paragraph 0743 specifically states:

OPEDS can be designed to support high availability. OPEDS shall have the capability to be initialized/terminated by manual input or automated script. Each application service can be documented in the context of appropriate libraries. OPEDS shall retain a log of all activation events. OPEDS can provide the capability for daily removal of all completed activation's from the on-line database and for sending them to an archive (i.e., a non-OLTP database, data warehouse database). OPEDS can be remotely administered. A single point of administration, per domain, shall be provided to manage CUIDs and passwords.

OPEDS is an Outside Plant Engineering Design System or a system Outside Plant facilities and landbase, according to *Kite*. Accordingly, *Kite* fails to disclose the management of records of assigned fiber splice jobs. Accordingly, the cited portions of

*Kite* fail to disclose at least “receiving a request from a user via one of the graphical user interfaces comprising a second graphical user interface to mark the fiber splice drawing record as closed.”

With regard to *VanDusen*, the reference discloses a method of doing business by creating an equity pool and compensating an associate with a portion of the equity pool. The Office Action contends that “VanDusen discloses tracking workflows jobs (Page 26, [1034], lines 13 - 17, VanDusen), which further includes receive a credit amount associated with jobs (Page 14, [0557], line 1, VanDusen).” The Office Action provides the following citations in *Kite* and *VanDusen* that are alleged to disclose claimed subject matter:

“reporting logic couple to the database producing a first report identifying each fiber splice drawing record assigned to the draftsman ([0429], and [0647], *Kite*; and Page8, [0235], lines 1 - 8, *VanDusen*)”

“producing a second report identifying each completed fiber splice drawing record assigned to the draftsman (Page 30, [0479], lines 56 - 62, and [0519], *Kite*; and Page 31, [1162], lines1 - 6, *VanDusen*)”

“producing a third report identifying each fiber splice drawing record assigned to a facility of draftsmen (Page 28, [0449], lines 1 - 3, and [0519], *Kite*; and Page 8, [0257], lines 4 - 7, *VanDusen*)”

“producing a fourth report identifying each completed fiber splice drawing record within a defined geographical region ([0516], and [0517], *Kite*)”.

In response, the claim recites “outputting a first report identifying each fiber splice drawing record assigned to the draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option.” Therefore, the claim describes a record of a drawing job for adding fiber splice representations in engineering drawings and producing a first report



identifying each record assigned to the draftsman; a second report identifying each completed record assigned to the draftsman; a third report identifying each record assigned to a facility of the draftsman; and a fourth report identifying each completed record with a defined geographic region. In contrast, the cited portions of *Kite* describe that FMS maintains which fiber strands are in use in various equipment, see paragraph 0429, and maintains statuses of fibers, see paragraph 0647. "User selects a tool in order to perform a certain function to a fiber, fiber strand, etc. such as assign reservation status, restoration priority, fiber strand diversity. 4. The system assigns the value appropriately to the fiber according to what the user indicated. 5. The user also may print out or view a report about the fiber, etc. 6. User logs out when finished." Paragraph 0655.

FMS may also be used to view states of location relief strategies. See paragraph 0479. *Kite* also discloses the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that "placed or modified that piece of equipment." See paragraphs 0449 and 0562. *Kite* further discloses reports of actual and forecasted network usage. See paragraph 0519. Paragraph 0516, referenced in the Office Action, describes summary reports on a company's fiber optic assets and paragraph 0517, cited in the Office Action, describes creating queries using a tool "capable of querying data related to equipment Xbox, CSA, Fiber, and LRS and performing joins."

None of which discloses the management of records of assigned fiber splice jobs. For example, paragraph 0235, cited in the Office Action, of *VanDusen* discloses getting a "report on the number of users who viewed that page within a set period of time." Paragraph 1162 of *VanDusen*, cited in the Office Action, discloses "a database of completed tasks containing the reported evaluations of skills, abilities, and performance of the individual performers, so that these data may be made available to prospective employers and other interested parties." Paragraph 257 of *VanDusen*, cited in the Office Action, discloses "[c]omprehensive Web-based tools for business users to manage the scheduling & delivery of site assets."

Accordingly, the cited portions of *Kite* and *VanDusen* fail to disclose at least "outputting a first report identifying each fiber splice drawing record assigned to the

draftsman, the first report containing a number of hours logged by the draftsman on the engineering drawing job identified by the fiber splice drawing record; outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman; outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen; and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region, wherein a report is produced in response to a selection of the report via an interface option.” Accordingly, *VanDusen* fails to cure the deficiencies of the *Kite* reference in suggesting or teaching all of the claimed features in claim 17. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination of *Kite* with *VanDusen* has not been made and the rejection of claim 17 should be withdrawn.

In the Office Action regarding Assignee’s earlier arguments, it is stated that the “Examiner respectfully disagrees. *Kite/VanDusen* does disclose: outputting a first report identifying each engineering drawing job assigned to the draftsman ([0429], and [0647], *Kite*; and Page 8, [0235], lines 1 - 8, *VanDusen*); outputting a second report identifying each completed fiber splice drawing record assigned to the draftsman (Page 30, [0479], lines 56 - 62, and [0519], *Kite*; and Page 31, [1162], lines 1 - 6, *VanDusen*); outputting a third report identifying each fiber splice drawing record assigned to a facility of draftsmen (Page 28, [0449], lines 1 - 3, and [0519], *Kite*; and Page 8, [0257], lines 4 - 7, *VanDusen*); and outputting a fourth report identifying each completed fiber splice drawing record within a defined geographical region ([0516], and [0517], *Kite*).” Pages 10-11.

Assignee respectfully disagrees and submits that, based on a review of the Office Action citations and respective disclosures, *Kite/VanDusen* discloses at most a report on which fiber strands are in use in various equipment; a report on a status of a location relief strategy, a report on the assignment of Sonic Circuit IDs to equipment and associating equipment with Engineering Work Orders that “placed or modified that piece of equipment”; a report on network usage forecasts; and queries on equipment. None of which discloses the management of records of assigned fiber splice jobs. For at least these reasons, the rejection should be withdrawn.

**g. Claims 18-20 and 22**

Dependent claims 18-20 and 22 are allowable as a matter of law for at least the reason that dependent claims 18-20 and 22 contain all the elements and features of independent claim 17. For at least this reason, the rejections of claims 18-20 and 22 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability, these dependent claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record.

### **CONCLUSION**

Any other statements in the Office Action that are not explicitly addressed herein are not intended to be admitted. In addition, any and all findings of inherency are traversed as not having been shown to be necessarily present. Furthermore, any and all findings of well-known art and official notice, or statements interpreted similarly, should not be considered well known for at least the specific and particular reason that the Office Action does not include specific factual findings predicated on sound technical and scientific reasoning to support such conclusions.

For at least the reasons set forth above, all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. In addition, Assignee reserves the right to address any comments made in the Office Action that were not specifically addressed herein. Thus, such comments should not be deemed admitted by the Assignee. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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